Ryan C. Bundy ID No. 79400-065 Nevada Southern Detention Center 2190 Ease Mesquite Avenue Pahrump, Nevada 89060 Pro se

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEVADA

| UNITED STATES OF AMERICA, | | 8 | CASE #: 2:16-cr-00046-GMN-PAL |
|---------------------------|------------|-------------|-------------------------------|
| | Plaintiff, | § § | |
| | | § | EMERGENCY MOTION FOR |
| | | § | CONTINUANCE AND OTHER |
| V. | | § | ACCOMMODATIONS |
| RYAN C. BUNDY | Defendant. | § § § | [EMERGENCY MOTION] |

EMERGENCY MOTION FOR CONTINUANCE AND OTHER ACCOMMODATIONS

Certification: This motion is timely filed.

COMES NOW, Defendant Ryan C. Bundy, pro se, requests a continuance of seven days (*subject to nearest date available per court calendar*) for the July 6, 2017 *ex-parte* hearing pursuant to LR IA-6 and states the following:

- 1.) Defendant Bundy received communication from the Court recently stating his appearance was requested in an *ex-parte* hearing with Angela Dows and Judge Navarro scheduled for July 6, 2017; related to a billing inquiry by the Court.
- 2.) Defendant Bundy has not seen or inspected standby counsel's billing related information submitted; and therefore, requests further clarification by the

Court.

- 3.) Further, Defendant conferred with standby counsel who has agreed to send the billing information and details to him inside Nevada Southern Detention Center; however, it is unlikely he will receive the billing information prior to the July 6, 2017 hearing date.
- 4.) Thus, a continuance is being requested for the purpose of receiving the documentation from standby counsel and hopefully receiving further clarification from this Court on what is specifically at issue.
- 5.) Moreover, Bundy's recent Notice [ECF No. 2105] to the Court stated he intended to file an emergency motion related to strip/body cavity searching of his person. After further in researching in the law library, Bundy finds more time for research is needed before filing the motion.
- 6.) Nevertheless, Bundy remains at odds with the oppressive strip/cavity search policy but desires to participate in the hearing to be helpful; therefore, Bundy requests that the Court consider accommodations and relieve him from the strip/cavity searches so he may appear before the Court, physically.
- 7.) Else, Bundy requests the Court consider allowing him appear telephonically at the hearing after a continuance; and further clarification by the Court; and after the billing documents have been mailed to him by standby counsel.

WHEREFORE, Defendant Bundy requests this Court GRANT his Motion for Continuance (subject to nearest date available per court calendar); GRANT further clarification by the Court and GRANT any other and further accommodations this Court deems proper and just.

Dated this 5th day of July, 2017

Respectfully submitted,

<u>/s/ Ryan C. Bundy</u> Ryan C. Bundy, *Pro se Defendant*

CERTIFICATE OF SERVICE

I, Ryan C. Bundy, do hereby certify that a true and correct copy of the foregoing pleading was served upon counsel of record, via CM/ECF.

Dated this 5th day of July, 2017

/s/ Ryan C. Bundy Ryan C. Bundy Pro Se Defendant

I certify that Angela H. Dows, Standby Counsel/Assistant for Ryan C. Bundy is a registered CM/ECF user and that service will be accomplished by the CM/ECF system.

<u>/S/</u>

Angela Dows, Esq.
Standby Counsel for Ryan C. Bundy
133 North Buffalo Drive, Suite 210
Las Vegas, Nevada 89128
Standby Counsel/Assistant for
Defendant Ryan C. Bundy